Reply Comments of KIEV-LP Camas, Washington / David Stepanyuk
MB Docket 19-193, 17-105
Amendments of Parts 73 and 74 For Improve Low Power FM Technical Rules

KIEV-LP is a low power FM station that serves the Camas, Washington area, which consists of Vancouver, Washington and East Portland metropolitan area. I am submitting this comment in support of the LPFM technical rule changes that are proposed. One especially relevant rule change is the codification of FM booster stations for low power FM. KIEV-LP has a construction permit for such station where terrain shielding and ground cover prevent our main signal from covering the station's community of license. If employed correctly, this is one of the few options we would have at our disposal to remedy this coverage issue.

But in addition to the recommendations for rule changes proposed by the Commission, I strongly support the Commission pursuing the option of "LP250", a 250 watt option for LPFM, as supported by other commenters. I wouldn't be too daring to venture to say that any LPFM station desires this.

KIEV-LP has irreconcilable interference issues. Located on 102.7 FM, we are first adjacent to a Portland fill-in translator at 102.9 FM, with 99 watts at 540 m AMSL. This is equivalent to a full power radio station. This translator's 60 dBu contour intersects our 60 dBu contour. Furthermore, there is a station on our co-channel that changed its operating location to a higher broadcast point that has decimated our signal (note: it is currently on Engineering STA at another location for the time being). We attempted to move to 102.5 FM, and were met by co-channel interference from two translators high up on mountains from several miles away. In both cases, although our station met the minimum FCC LPFM spacing, but both 102.5 FM and 102.7 FM receive incoming interference within KIEV-LP's 60 dBu contour.

The FM band is exceedingly crowded nowadays due to the proliferation of cross-service FM translators--especially fill-in translators that can have coverage of a small full power station. In the Pacific Northwest, a translator can be placed on a mountain and travel dozens of miles and still interfere within an LPFM's 60 dBu contour.

For most LPFM stations in urban areas, there are no remediatory options for eliminating this interference. Without being able to have inference-free listening within a 60 dBu contour means it is difficult to sustain broadcasting because sponsors are hesitant to underwrite on stations they cannot hear. Most LPFM stations are facing this unsustainability.

For this reason, the FCC's adoption of LP250 is a matter of the possibility of lasting life and inevitable death for many LPFM stations. Please consider allowing a rule change for LP250 upgrade for LP100 stations. I believe it is the least that can be allowed.

Respectfully,

David Stepanyuk

David Stepanyuk
Manager of KIEV-LP